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Docket Number 50-346

License Number NPF-3

Serial Number 2999

February 10, 2004

United States Nuclear Regulatory Commission Document Control Desk Washington, D. C. 20555-0001

Subject: Correction of Information Provided in License Amendment Request No. 96-0008 (TAC No. MA6092)

## Ladies and Gentlemen:

During an Extent of Condition review of prior NRC submittals for completeness and accuracy, an inaccuracy was identified with information provided for the Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS) in FirstEnergy Nuclear Operating Company (FENOC) letter Serial Number 2397, "License Amendment Application to Revise Technical Specification 3/4.7.5.1, Ultimate Heat Sink (License Amendment Request No. 96-0008; TAC No. MA6092)," dated July 28, 1999. This License Amendment Request (LAR) was approved by the NRC in a License Amendment and associated Safety Evaluation dated September 12, 2000 (FENOC letter Log Number 5705), increasing the allowable Ultimate Heat Sink (UHS) average water temperature, as specified in Technical Specification Limiting Condition for Operation 3.7.5.1.b, from ≤ 85 °F to ≤ 90 °F. The NRC Regional Administrator was previously notified of the inaccurate information contained in the LAR by letter dated July 15, 2003 (FENOC letter Serial Number 1-1324). This letter is a follow-up to the July 15 letter, and provides more detailed information.

The LAR 96-0008 submittal noted that the post-loss-of-coolant accident containment response analysis had been re-performed and described the resulting changes to the calculated containment temperature and pressure profiles. Regarding the impact of the revised containment temperature profile on environmental qualification, the LAR stated that an evaluation had concluded that the equipment qualification tests demonstrate that the instrumentation required to monitor the course of an accident has a qualified life of approximately 1 year or greater. However, contrary to this statement, it was subsequently

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identified that at the time of the LAR submittal, not all instrumentation located in containment and required to monitor the course of an accident had a qualified life of approximately one year or greater.

A review was performed of equipment-located in containment which is in the scope of the environmental qualification (EQ) program. Calculation C-ECS-201.10-001, Revision 1, dated July 30, 1996 (Reference 4 of the LAR) was reviewed to determine the required post-accident operating time and the qualified post-accident operating time as of the date of the LAR submittal. Note that some equipment located in containment has a required post-accident operating time of less than one year. Equipment in the scope of the EQ program is required to have a qualified post-accident operating time which exceeds the required post-accident operating time. Enclosure 1 lists equipment that did not meet the required post-accident operating time as of the date of the LAR submittal. Enclosure 1 also shows that per the current revision of Calculation C-ECS-201.10-001 (Revision 2 dated March 30, 2003), these discrepancies have been corrected by reanalysis and that their qualified life is one year or greater.

FENOC does not believe that the inaccurate information provided with respect to LAR 96-0008 presents a significant implication for the public health and safety or common defense and security since the instrumentation has now been demonstrated to meet the required qualified life.

No response to this letter is requested or required. However, should you have any questions or require additional information, please contact Mr. Gregory A. Dunn, Manager - Regulatory Affairs, at (419) 321-8450.

Very truly yours,

**MKL** 

Enclosures

cc: Regional Administrator, NRC Region III

J. B. Hopkins, NRC/NRR Senior Project Manager

C. S. Thomas, NRC Region III, DB-1 Senior Resident Inspector Utility Radiological Safety Board

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|           | <b>"特别的人,我们们们们们们们们们们们们们们们们们们们们们们们们们们们们们们们们们们们们</b>                                   | <b>注题的基础的</b>  | <b>经期间的</b>  | REQ'D POST-       | QUALIFIED POST-   | QUALIFIED POST-   |
|-----------|--|----------------|--------------|-------------------|-------------------|-------------------|
| ASSET     | ASSET DESCRIPTION  | LOCATION       | EQ PACKAGE   | OPERATING TIME    | OPERATING TIME    | OPERATING TIME    |
| NAME      |  |                |              | (C-ECS-201.10-001 | (C-ECS-201.10-001 | (C-ECS-201.10-001 |
| 1.048.030 |  |                |              | REV. 1 & 2)       | REV. 1)           | REV. 2)           |
| PTRC2A3   | REACTOR COOLANT LOOP 2 HOT<br>LEG WIDE RANGE PRESSURE<br>TRANSMITTER, SFAS CHANNEL 4 | CTMT9_407*_603 | 015A         | 1 YEAR            | 0.58 YEARS        | 1.21 YEARS        |
| PTRC2A4   | REACTOR COOLANT LOOP 2 HOT<br>LEG WIDE RANGE PRESSURE<br>TRANSMITTER, SFAS CHANNEL 2 | CTMT9_407*_603 | 015A         | 1 YEAR            | 0.58 YEARS        | 1.21 YEARS        |
| PTRC2B3   | REACTOR COOLANT LOOP 1 HOT<br>LEG WIDE RANGE PRESSURE<br>TRANSMITTER, SFAS CHANNEL 3 | CTMT9_407*_603 | 015A         | 1 YEAR            | 0.58 YEARS        | 1.21 YEARS        |
| PTRC2B4   | REACTOR COOLANT LOOP 1 HOT<br>LEG WIDE RANGE PRESSURE<br>TRANSMITTER, SFAS CHANNEL 1 | CTMT9_407*_603 | 015A         | 1 YEAR            | 0.58 YEARS        | 1.21 YEARS        |
| PTSP12A2  | STEAM GENERATOR 1-2 OUTLET<br>STEAM PRESSURE TRANSMITTER                             | CTMT9_317*_585 | 015A         | 1 YEAR            | 0.58 YEARS        | 1.21 YEARS        |
| PTSP12B1  | STEAM GENERATOR 1-1 OUTLET<br>STEAM PRESSURE TRANSMITTER                             | CTMT9_316*_585 | 015A         | 1 YEAR            | 0.58 YEARS        | 1.21 YEARS        |
| RE4596A   | CONTAINMENT HIGH RANGE<br>RADIATION ELEMENT  | CTMT9_407*_643 | 016          | 1 YEAR            | 0.47 YEARS        | 1 YEAR            |
| RE4596B   | CONTAINMENT HIGH RANGE<br>RADIATION ELEMENT  | CTMT9_407*_643 | 016          | 1 YEAR            | 0.47 YEARS        | 1 YEAR            |
| LTSP9A6   | STEAM GENERATOR 1-2 STARTUP<br>LEVEL TRANSMITTER FOR SFRCS<br>LOGIC CHANNEL 1        | CTMT9_220*_565 | 030B         | 1 YEAR            | 0.58 YEARS        | 1.21 YEARS        |
| LTSP9B6   | STEAM GENERATOR 1-1 STARTUP<br>LEVEL TRANSMITTER FOR SFRCS<br>LOGIC CHANNEL 2        | CTMT9_215*_565 | <b>0</b> 30B | 1 YEAR            | 0.58 YEARS        | 1.21 YEARS        |
| LT4594    | CONTAINMENT VESSEL WATER<br>LEVEL TRANSMITTER - WIDE RANGE                           | CTMT9_183*_537 | 030C         | 1 YEAR            | 0.58 YEARS        | 1.21 YEARS        |
| LT4595    | CONTAINMENT VESSEL WATER<br>LEVEL TRANSMITTER - WIDE RANGE                           | CTMT9_183*_537 | 030C         | 1 YEAR            | 0.58 YEARS        | 1.21 YEARS        |
| LTRC14-1  | REACTOR COOLANT PRESSURIZER LEVEL TRANSMITTER  | CTMT9_317*_585 | 030C         | 1 YEAR            | 0.58 YEARS        | 1.21 YEARS        |
| LTRC14-3  | REACTOR COOLANT PRESSURIZER LEVEL TRANSMITTER  | CTMT9_317*_585 | 030C         | 1 YEAR            | 0.58 YEARS        | 1.21 YEARS        |
| PT6365A   | REACTOR COOLANT EXTENDED RANGE PRESSURE TRANSMITTER                                  | CTMT9_410*_603 | 030E         | 1 YEAR            | 0.58 YEARS        | 1.21 YEARS        |
| PT6365B   | REACTOR COOLANT EXTENDED RANGE PRESSURE TRANSMITTER                                  | CTMT9_407*_603 | 030E         | 1 YEAR            | 0.58 YEARS        | 1.21 YEARS        |
| MISC      | INSTRUMENTATION CABLE<br>(BOSTON INSULATED WIRE)                                     | СТМТ           | 007A         | 1 YEAR            | 0.99 YEARS        | 2.46 YEARS        |
| MISC      | CONDUIT SEALS<br>(CONAX)   | CTMT           | 051          | 1 YEAR            | 0.95 YEARS        | 1.37 YEARS        |

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## **COMMITMENT LIST**

THE FOLLOWING LIST IDENTIFIES THOSE ACTIONS COMMITTED TO BY THE DAVIS-BESSE NUCLEAR POWER STATION (DBNPS) IN THIS DOCUMENT. ANY OTHER ACTIONS DISCUSSED IN THE SUBMITTAL REPRESENT INTENDED OR PLANNED ACTIONS BY THE DBNPS. THEY ARE DESCRIBED ONLY FOR INFORMATION AND ARE NOT REGULATORY COMMITMENTS. PLEASE NOTIFY THE MANAGER – REGULATORY AFFAIRS (419-321-8450) AT THE DBNPS OF ANY QUESTIONS REGARDING THIS DOCUMENT OR ANY ASSOCIATED REGULATORY COMMITMENTS.

| COMMITMENTS | DUE DATE |  |  |  |
|-------------|----------|--|--|--|
| None.       | N/A      |  |  |  |